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*Pro Bono* Attorneys for Plaintiffs,  
Esvin Fernando Arredondo Rodriguez and A.F.A.J.

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ESVIN FERNANDO ARREDONDO  
RODRIGUEZ INDIVIDUALLY AND  
A.F.A.J., A MINOR, BY HER GUARDIAN  
AD LITEM, JEFFREY HAMILTON,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No.: CV 22-02845-JLS-AFM

**NOTICE OF MOTION FOR  
DOCUMENT PRODUCTION**

**[DISCOVERY DOCUMENT:  
REFERRAL TO MAGISTRATE  
JUDGE REQUESTED]**

Date: October 25, 2023

Time: 10:00 AM

Pursuant to Local Rule 37, on October 25, 2023, or as soon thereafter as  
counsel can be heard, Plaintiffs Esvin Fernando Arredondo Rodriguez (“Mr.  
Arredondo Rodriguez”) and his minor daughter A.F.A.J. (together, “Plaintiffs”) will  
motion the Court to order Defendant, the United States of America, to produce all

1 documents and materials responsive to Plaintiffs RFP 1, all materials produced in  
2 the other Family Separation Federal Tort Claims Act cases pending in Federal  
3 Courts across the country. The parties' respective positions are set forth in the Joint  
4 Stipulation filed concurrently with this Notice pursuant to Local Rule 37-2.  
5  
6

7 Dated: October 3, 2023

Respectfully Submitted,

8 **MILBANK LLP**

9 By: /s/ Linda Dakin-Grimm

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